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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91211409
Party	Defendant Montpelier Re Holdings Ltd.
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Date	08/12/2013
Attachments	Answer to Notice of Opposition - Montpelier Re Holdings Ltd.pdf(13320 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

BLUEBAY ASSET MANAGEMENT)	
(SERVICES) LTD.,)	
)	Opposition No.: 91211409
Opposer,)	
)	Serial Nos. 85/876,385,
v.)	85/806,491, and
)	85/871,053
MONTPELIER RE HOLDINGS LTD.,)	
)	
Applicant.		

ANSWER TO NOTICE OF OPPOSITION

Montpelier Re Holdings Ltd. (“Applicant”), by and through its attorneys,
answers the Notice of Opposition filed by BlueBay Asset Management (Services) Ltd.
 (“Opposer”) as follows:

1. Applicant admits the allegations of Paragraph 1 of Opposer’s Notice of Opposition.
2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 2 of Opposer’s Notice of Opposition and therefore, denies those allegations.
3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 3 of Opposer’s Notice of Opposition and therefore, denies those allegations.
4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 4 of Opposer’s Notice of Opposition and therefore, denies those allegations.

5. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 5 of Opposer's Notice of Opposition and therefore, denies those allegations.

6. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 6 of Opposer's Notice of Opposition and therefore, denies those allegations.

7. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 7 of Opposer's Notice of Opposition and therefore, denies those allegations.

8. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 8 of Opposer's Notice of Opposition and therefore, denies those allegations.

9. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 9 of Opposer's Notice of Opposition and therefore, denies those allegations.

10. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 10 of Opposer's Notice of Opposition and therefore, denies those allegations.

11. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 11 of Opposer's Notice of Opposition and therefore, denies those allegations.

12. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 12 of Opposer's Notice of Opposition and therefore, denies those allegations.

13. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 13 of Opposer's Notice of Opposition and therefore, denies those allegations.

14. Applicant admits the allegations of Paragraph 14 of Opposer's Notice of Opposition.

15. Applicant admits the allegations of Paragraph 15 of Opposer's Notice of Opposition.

16. Applicant admits the allegations of Paragraph 16 of Opposer's Notice of Opposition.

17. Applicant denies the allegations of Paragraph 17 of Opposer's Notice of Opposition.

18. Applicant admits that Applicant's BLUE CAPITAL ADVISORS LTD. & Design and its BLUE CAPITAL INSURANCE MANAGERS LTD. & Design marks were filed on an intent to use basis, pursuant to § 1(b) and that Applicant's BLUE CAPITAL MANAGEMENT LTD. & Design mark was filed on a use basis, pursuant to § 1(a). Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 18 of Opposer's Notice of Opposition and therefore, denies those allegations.

19. Applicant denies the allegations of Paragraph 19 of Opposer's Notice of Opposition.

20. Applicant denies the allegations of Paragraph 20 of Opposer's Notice of Opposition.

21. Applicant neither admits nor denies the allegations of Paragraph 21 of Opposer's Notice of Opposition.

22. Applicant neither admits nor denies the allegations of Paragraph 22 of Opposer's Notice of Opposition.

All other allegations in Opposer's Notice of Opposition that are not explicitly admitted herein are denied.

WHEREFORE, Applicant prays that this Opposition be dismissed with prejudice and that Application Serial Nos. 85/876,385, 85/806,491, and 85/871,053 be allowed to issue to registration.

Dated this 12th day of August, 2013.

Respectfully submitted,

/s/Andrea Anderson

Andrea Anderson

Larry H. Tronco

Janet Shih Hajek

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**ATTORNEYS FOR APPLICANT
MONTPELIER RE HOLDINGS LTD.**

CERTIFICATE OF SERVICE

I certify that on August 12, 2013, I served a copy of the foregoing **ANSWER TO NOTICE OF OPPOSITION** to the following by:

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☐
☐

U.S. Mail, postage prepaid
Hand Delivery
Fax

Brent L. Farese, Esq.
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/s/Janet Shih Hajek
Janet Shih Hajek